

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**JAMES T. BRADLEY and GARRETT LAMBERT,
in their own right and on behalf of others
similarly situated,**

Plaintiffs,

v.

**Civil Action No. 2:18-cv-00007
Judge John T. Copenhaver, Jr.**

**LEGACY LAND MANAGEMENT, INC.,
KENNETH LAMBERT, and SHERRI
LAMBERT, individually,**

Defendants.

**JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT
AND PRELIMINARY CERTIFICATION OF SETTLEMENT CLASS**

COMES now the Plaintiffs, James T. Bradley and Garrett Lambert in their own right and behalf of others similarly situated, by counsel, and Defendants, Legacy Land Management, Inc., Kenneth Lambert, and Sherri Lambert, individually, by counsel, and requests this Court pursuant to Federal Rules of Civil Procedure Rule 23(a) and Rule 23(b)(1)(B) and seek the following:

1. Preliminary approval of class action and settlement agreement.
2. Preliminary certification of a mandatory settlement class.

In support thereof, the Plaintiffs submit the detailed attached Memorandum of Law.

PLAINTIFFS,

By Counsel

/s/ Greg A. Hewitt

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CERTIFICATE OF SERVICE

I, Greg A. Hewitt, counsel for Plaintiffs, do hereby certify that the foregoing Certificate of Service for **Joint Motion for Preliminary Approval of Class Settlement and Preliminary Certification of Settlement Class** has been filed with the Court on this 15th day of August, 2019, using the CM/ECF system.

/s/ Greg A. Hewitt

Greg A. Hewitt (WVSB 7457)
Counsel for Plaintiffs